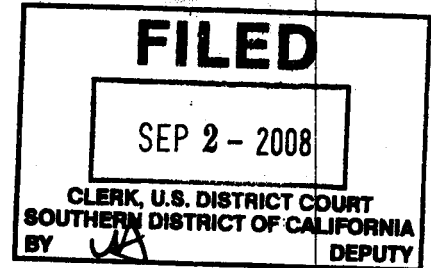


(Name) Mr. Leroy Willis Jr. **TT10645 (500208257)**  
 (Address) 1173 Front Street **IN Jail on**  
 (City, State, Zip) San Diego, CA **above case.**  
 (CDC Inmate No.) 7710645 **ARREST**  
**9-19-07**  
**JAH-JMA** **NUNC PRO TUNC**  
**AUG 29 2008**

**United States District Court**  
**Southern District of California**



Leroy Willis Jr. **7710645**  
 (Enter full name of plaintiff in this action.)

Plaintiff,

Civil Case No. 08cv 844  
 (To be supplied by Court Clerk)

v.

**FIRST AMENDED**  
 Complaint under the  
 Civil Rights Act  
 42 U.S.C. § 1983

Chief: Phil Hillender, Deputy Sheriff  
R. Liekweg, CEO UCSD Hillcrest  
Deputy J. Anderson, Deputy  
Deputy KATRA, Deputy  
 (Enter full name of each defendant in this action.)

Defendant(s).

**A. Jurisdiction**

Jurisdiction is invoked pursuant to 28 U.S.C. § 1343(a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional authority, list them below.

**B. Parties**

1. **Plaintiff:** This complaint alleges that the civil rights of Plaintiff, Mr. Leroy Willis Jr.  
 (print Plaintiff's name)  
 , who presently resides at 1173 Front Street  
 (mailing address or place of confinement)  
SAN DIEGO, CA 92101, were violated by the actions  
 of the below named individuals. The actions were directed against Plaintiff at Central Jail  
Cedarvale And Arrest on (dates) 4-1-08, and 4-1-08  
 (institution/place where violation occurred) (Count 1) (Count 2) (Count 3)

2. Defendants: (Attach same information on additional pages if you are naming more than 4 defendants.)

Defendant Mr. Bill Kollender Deputy Chief resides in 1173 FRONT SDCA 92101  
 (name) (County of residence)

and is employed as a Deputy Sheriff. This defendant is sued in  
 (defendant's position/title (if any))

☒ his/her ☐ individual ☐ official capacity. (Check one or both.) Explain how this defendant was acting

under color of law: Bill Kollender Deputy Sheriff Acted under color

of the state Law COMMITTED ACT OF CRUEL UNUSUAL punishment  
PROTECTED UNDER U.S. CONSTITUTION CIVIL RIGHTS 8TH AMENDMENT

Defendant Mr. Richard Liekweg CEO resides in 200 West Arbor Drive SDCA  
 (name) (County of residence) 9253

and is employed as a Chief executive officer. This defendant is sued in  
 (defendant's position/title (if any))

☒ his/her ☐ individual ☐ official capacity. (Check one or both.) Explain how this defendant was acting

under color of law: MR LIEKWEG Acted under color of the state Law COMMITTED

ACT OF CRUEL & UNUSUAL punishment Protected under  
U.S. CONSTITUTION CIVIL RIGHTS CIVIL RIGHTS 8TH AMENDMENT

Defendant MR DEPUTY KATRA resides in 1173 FRONT SDCA 92101  
 (name) (County of residence)

and is employed as a DEPUTY SHERIFF. This defendant is sued in  
 (defendant's position/title (if any))

☒ his/her ☐ individual ☐ official capacity. (Check one or both.) Explain how this defendant was acting

under color of law: DEPUTY KATRA ACTED under color OF THE STATE LAW

COMMITTED ACT OF CRUEL UNUSUAL punishment PROTECTED  
under U.S. CONSTITUTION CIVIL RIGHTS 8TH AMENDMENT

Defendant MR DEPUTY ANDERSON resides in 1173 FRONT SDCA 92101  
 (name) (County of residence)

and is employed as a DEPUTY SHERIFF. This defendant is sued in  
 (defendant's position/title (if any))

☒ his/her ☐ individual ☐ official capacity. (Check one or both.) Explain how this defendant was acting

under color of law: MR DEPUTY ANDERSON ACTED under color OF THE STATE

LAW COMMITTED ACT OF CRUEL UNUSUAL punishment PROTECTED  
under U.S. CONSTITUTION CIVIL RIGHTS 8TH AMENDMENT

**EXCESSIVE FORCE BY BILL KOLLENDER DEUTIES**  
**C. Causes of Action** (You may attach additional pages alleging other causes of action and the facts supporting them if necessary.) **ACTED UNDER COER OF THE STATE LAW**

Count 1: The following civil right has been violated:

**EXCESSIVE FORCE, 2008 NIGHTMARES HAS OCCURRED.** (E.g., right to medical care, access to courts, due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.)

**Supporting Facts:** [Include all facts you consider important to Count 1. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, by name, did to violate the right alleged in Count 1.]

**CHIEF DEUTY BILL KOLLENDER DEUTIES**  
**ANDERSON DEUTY WITH USED EXCESSIVE**  
**FORCE AND ATTACKED ME IN MY WILSON**  
**WHILE I WAS RESTRAINED ON MY BACK**  
**TO A HOSPITAL BED UNDERGOING**  
**TREATMENT AT LINDS HOSPITAL.**  
**THIS OCCURRED UNDER COER OF THE**  
**STATE LAW WHICH VIOLATED MY**  
**CIVIL RIGHTS CRUEL AND UNUSUAL**  
**PUNISHMENT EXCESSIVE FORCE**  
**LEFT EYE INJURED AT TIME**  
**OF INCIDENT. NOW MR WILLIS**  
**SUFFERS FROM NIGHTMARES EMOTIONAL**  
**STRESS IN HIS SLEEP AS A RESULT NOW IN**  
**2008. FROM THE ASSAULT IN 2002.**  
**THE NEW ONSET INJURY IS**  
**CONSTANT AND HAS COME ON**  
**IN 2008 WITHOUT WARNING THE**  
**NIGHTMARES WERE REPORTED**  
**TO COUNTY ADMINISTRATION SEE**  
**CLAIM PREVIOUSLY FORWARDED TO**  
**YOU BOTTOM CORNER FRONT**  
**ORANGE ALONG WITH LICSD MEDICAL RECORDS**  
**1 OF 3. THERE ACTS VIOLATED U.S.**  
**CONSTITUTION UNDER 8TH AMEND**  
**CRUEL AND UNUSUAL PUNISHMENT**



Count 2: The following civil right has been violated:

(E.g., right to medical care, access to courts

due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.)

**Supporting Facts:** [Include all facts you consider important to Count 2. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, by name, did to violate the right alleged in Count 2.]

EXCESSIVE FORCE BY CEO AND NURSE  
 ACTED UNDER COLOR OF STATE LAW. EXCESSIVE FORCE  
 WHICH VIOLATED U.S. CONSTITUTION 8TH AMENDMENT  
 UNDER CRUEL AND UNUSUAL PUNISHMENT.  
 IN 2008 MR WILLIS  
 HAS NIGHTMARES WHILE SLEEP  
 WHICH HAS CAUSED EMOTIONAL DAMAGE  
 AND STRESS NEW INJURY FROM  
 2002 ATTACK. I AM HAVING NIGHT  
 MARES CAUSE I REMEMBER IT ALL OVER AGAIN  
 BEING ASSAULTED BY TWO DEPUTIES  
 EMPLOYED BY OIL REFINER. CANNOT SLEEP  
 THIS NEW ONSET INJURY IS  
 OCCURRING AGAIN IN SLEEP. LICSD MEDICAL  
 HOSPITAL CEO RICHARD LIEKWEY  
 EMPLOYEES CONTRIBUTED TO ATTACK  
 BY HAVING TWO MEDICAL  
 PATIENTS IN SAME ROOM WITH  
 MEDICAL ID BAND. JEROY WILLIS A  
 ERR WHEN I ASKED A QUESTION TO NURSE SHE  
 RAN OUT OF ROOM DEPUTIES SAID SHUT UP  
 AND CAME INTO MY BED WITH GUN  
 ON CHOKING ME AND ASSAULTED ME.  
 VERY CRUEL. REAL SAD.  
 RICHARD LIEKWEY CEO AND LICSD  
 EMPLOYEES ACTED UNDER COLOR OF  
 STATE LAW AND VIOLATED MY CIVIL RIGHTS  
 TO CRUEL AND UNUSUAL PUNISHMENT  
 A 8TH AMENDMENT U.S. CONSTITUTIONAL  
 VIOLATION. THEY FILED TO HAVE ESCAPE  
 CHARGES TO COVER THEIR REACTIONS  
 AND LICSD TRIED TO HIDE INCIDENT  
 UNDER COVER. NOW INJURY HAS NEW NATURE.

Count 3: The following civil right has been violated: SAME AS MERS  
1 2 3 4 OF COMPLAINT  
 (E.g., right to medical care, access to courts,  
 due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment,  
 etc.)

Supporting Facts: [Include all facts you consider important to Count 3. State what happened clearly and in  
 your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant,  
 by name, did to violate the right alleged in Count 3.]

CIVIL RIGHTS  
 VIOLATED IN 2008  
 EXCESSIVE FORCE NIGHTMARES  
 8TH AMENDMENT U.S.  
 CONSTITUTION CRUEL  
 UNUSUAL PUNISHMENT  
 HOUSED IN AD SEC PERMANENT.  
 SINCE 2002 FROM THERE ATTACK  
 ON ME. THERE D.A.  
 REFERRAL WAS DENIED  
 NIGHTMARES HIS  
 MILD EUPHORIA  
 PAIN & STRESS IN  
 2008.

**D. Previous Lawsuits and Administrative Relief**

1. Have you filed other lawsuits in state or federal courts dealing with the same or similar facts involved in this case? ☒ Yes ☐ No.

If your answer is "Yes", describe each suit in the space below. [If more than one, attach additional pages providing the same information as below.]

(a) Parties to the previous lawsuit:

Plaintiffs: FRIST AMENDED complaint

Defendants: 08-0844-JAH C JMA

(b) Name of the court and docket number: \_\_\_\_\_

(c) Disposition: [ For example, was the case dismissed, appealed, or still pending?] \_\_\_\_\_

(d) Issues raised: \_\_\_\_\_

(e) Approximate date case was filed: 4-08

(f) Approximate date of disposition: \_\_\_\_\_

2. Have you previously sought and exhausted all forms of informal or formal relief from the proper administrative officials regarding the acts alleged in Part C above? [E.g., CDC Inmate/Parolee Appeal Form 602, etc.] ? ☒ Yes ☐ No.

If your answer is "Yes", briefly describe how relief was sought and the results. If your answer is "No", briefly explain why administrative relief was not sought.

SENT NEW INJURY  
CLAIM 121600 PACIFIC HWY  
SD.C. 92101 COURT Adminis  
TRATION OFFICE 208 SEE CLAIM  
IN YOUR FILE.

**E. Request for Relief**

Plaintiff requests that this Court grant the following relief:

1. An injunction preventing defendant(s):

DO NOT HARM ME ANYMORE.  
PLEASE LAWYER SERIOUS. ENOUGH HIS  
ENOUGH, [scribble] THEY ARE CRUEL.

2. Damages in the sum of \$ 1 million

3. Punitive damages in the sum of \$ 1 million

4. Other: 2008 INJURY

**F. Demand for Jury Trial**

Plaintiff demands a trial by ☒ Jury ☐ Court. (Choose one.)

**G. Consent to Magistrate Judge Jurisdiction**

In order to insure the just, speedy and inexpensive determination of Section 1983 Prisoner cases filed in this district, the Court has adopted a case assignment involving direct assignment of these cases to magistrate judges to conduct all proceedings including jury or bench trial and the entry of final judgment on consent of all the parties under 28 U.S.C. § 636(c), thus waiving the right to proceed before a district judge. The parties are free to withhold consent without adverse substantive consequences.

The Court encourages parties to utilize this efficient and expeditious program for case resolution due to the trial judge quality of the magistrate judges and to maximize access to the court system in a district where the criminal case loads severely limits the availability of the district judges for trial of civil cases. Consent to a magistrate judge will likely result in an earlier trial date. If you request that a district judge be designated to decide dispositive motions and try your case, a magistrate judge will nevertheless hear and decide all non-dispositive motions and will hear and issue a recommendation to the district judge as to all dispositive motions.

You may consent to have a magistrate judge conduct any and all further proceedings in this case, including trial, and the entry of final judgment by indicating your consent below.

Choose only one of the following:

☐ Plaintiff consents to magistrate judge jurisdiction as set forth above.

OR

☒ Plaintiff requests that a district judge be designated to decide dispositive matters and trial in this case.

Date

8-22-08

Signature of Plaintiff

[Signature]



# (1) Additional

Under penalty AND  
per court UCSO CEO R-  
LICKWEG-Bill Koller ect ALL NAMED.  
Under color of STATE ACTED  
Cruel AND unusual  
punishment & excessive  
force ect AL PAGE 1  
THROUGH 5. TO SATISFY  
PAGE 4 (B) ORDER FILED  
7-15-08 U.S. DISTRICT  
COURT 7-15-08. ALSO TO ADDRESS  
PAGE 6 Tolling ISSUE  
SEE General CODE OF  
CIVIL PROCEDURE 312.  
MR WILLIS NIGHT MARES  
AND INJURY. I BECAME  
AWARE OF OCCURENCE IN 2008  
AND I FILED TO THE COURT  
CONCERNING PAIN & SUFFERING  
FROM NIGHT MARES  
RELATED TO INCIDENT  
SHERIFF DEPT UCSO ETAL  
CEO. I HAVE NO CONTROL  
WHEN I BECAME  
ACTUALLY EMOTIONALLY  
EFFECTED BY A INCIDENT  
IN MY SLEEP. NOTE  
TRUE FACTS



(1)

SENT TO PRISON MAY  
2002 PAROLED 2005.6-3-05  
REARRESTED 2005 9-05  
PAROLED AGAIN 2007-7-2-07  
REARRESTED 9-19-07

INJURY DID NOT  
IN SUE UNTIL 2008.  
I FILED CLAIM 2008  
DO TO NIGHTMARES  
WERE DIRECTLY SOLEY  
TO INCIDENT CAUSED  
BY ALL NAMED IN  
COMPLAINT IN 2008.

SHERIFF DEPT STATUE  
TO FILE CHARGES ON  
THEIR ALLEGE ALLEGATION  
THEY CLAIM WAS THE  
CAUSE OF INCIDENT  
EXPIRED BY LAW? IN?

MR WILLIS WAS CLASSIFIED  
AS A LEVEL SIX ESCAPE  
RISK ALL LIES TO COVER  
UP INCIDENT. I WAS  
CHAIN TO A BED ON

(3)

Placed in a  
green jump  
SUIT. ALERT STAFF

Placed in ADSE9  
EVERY TIME I  
COME INTO JAIL  
24 HOUR LOCK DOWN  
I AM BY STAFF

HATED DUE TO  
D.A. WOULD NOT  
FILE ON CHARGES ON ME  
THEY EVEN SAID  
I WENT FOR  
THE GUN BUT  
FAILED TO DRAW  
THE GUN  
ANYONE WITH A  
BRAIN SMELLS

COVER UP  
NEVER HAD A RULE  
VIOLATION HEARING ON  
INCIDENT THEY  
TYPE WHAT THEY  
PLEASE IN THEIR COMPUTER  
AND LOG.  
Good old BOYS

HAMA NARRA ALI

NOTE PETITIONER

HAS MENTAL AND EMOTIONAL  
PAIN AND IT'S VERY HARD

TO COMPREHENDING  
LAW DUE TO  
PSYCHOTROPIC MEDICATION

THIS IS A SERIOUS AND  
HARD → ISSUE THE CASE IS  
COMPLEX FOR THOSE REASON

ALONE PETITIONER ASK A  
PRAY COUNSEL BE APPOINTED.

SEE EXHIBIT A.

LEAH WILLIS JR V.

BILL KOLLENDER, SHERIFFS DEPUTY  
ANDERSON KATRA, CEO, RICHARD  
LIEW KEE, UCSD MEDICAL  
ET, AL

under penalty  
and perjury.

MC NABB V. UNITED STATES, 318  
U.S. 332 (1943).

SUPERVISORY BOARD OF THE

NAME and NUMBER

CDC NUMBER:

H36974

CDC 128-C

CDC-128-

WILLIS, LEROY

R.J. Donovan Correctional Facility  
F4200000000142LANNUAL TB CHRONO  
TB SKIN TESTING

## DISTRIBUTION

CENTRAL FILE: ☒MEDICAL FILE: ☒INMATE: ☒

INMATE TB ALERT CODE

22

03-14-2007

DATE

LARRY LYLE, PHYSICIAN &amp; SURGEON

MEDICAL, PSYCHIATRIC, DENTAL

EXHIBIT  
A

STATE OF CALIFORNIA

CDC FORM 128C

## MENTAL HEALTH PLACEMENT

DEPARTMENT OF CORRECTIONS

MHPCv2.0 [5-1-97]

Effective 6-1-97

NAME: Willis, Leroy CDC# H36974 INST: RSD ☒ HOUSING: 420-142  
LAST FIRST MI JRC

THIS INMATE HAS COMPLETED A MENTAL HEALTH EVALUATION WITH THE FOLLOWING RESULTS (check box(es) below):

- a) ☐ Does Not Meet Criteria for Inclusion in the Mental Health Treatment Population.
- b) ☒ Meets Inclusion Criteria for the MH Treatment Population (Check Level of Care [LOC] Below)  
☐ No ☒ Yes Inclusion is for of Medical Necessity (Obtain Chief Psychiatrist Signature Below).
- c) ☐ Presently included in MHSDS, new LOC below (Check LOC Below).

LOC: ☐ Inpatient DMH ☐ Crisis Beds (MHCB) ☐ Enhanced Outpatient Program (EOP)/Cat J ☒ Clinical Case Management (CCCMS)/Cat JLevel of Functioning Assessment (GAF score): 65 Psychotropic Medication Prescribed: ☒ Yes ☐ No

Behavioral Alerts: \_\_\_\_\_

Rodriguez 7133 Rodriguez 0722  
 CLINICIAN'S LAST NAME (PRINT) PHONE / EXTENSION CLINICIAN'S SIGNATURE DATE CHIEF PSYCHIATRIST & DESIGNEE SIGNATURE

Original to be placed in Central File within 48 Hrs.; Copies to: Correctional Counselor I, Unit Health Record